

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re
CITY OF DETROIT, MICHIGAN,
Debtor

Chapter 9
Case No. 13-53846
Hon. Steven W. Rhodes

**OBJECTIONS TO THE PETITION FILED BY ONE KEVYN D. ORR SEEKING TO
COMMENCE A CASE UNDER CHAPTER 9 OF TITLE 11 OF THE UNITED STATES
CODE ON BEHALF OF THE CITY OF DETROIT, MICHIGAN**

I, Deborah Lela Moore (dob: 10-6-50), received a notice by mail on or about Aug 18, 2013, identifying me as possible creditor or interested party in the above captioned matter. In response to said notice, I do hereby file objections to the petition filed by Kevyn D. Orr, seeking to commence a case under Chapter 9 of the U.S. Bankruptcy Code on behalf of the City of Detroit, Michigan, and in support of said objections, I state the following:

OBJECTIONS

1. I am a creditor or interested party in the purported bankruptcy filed by Kevyn D. Orr.
2. Pursuant to Michigan Public Act 436 of 2012, Kevyn Orr was appointed emergency manager of City of Detroit by Michigan Governor, Rick Snyder on or about February 22, 2013.
3. Kevyn Orr filed this pending petition for bankruptcy on behalf of the City of Detroit, Michigan; however, there is no provision in Chapter 9, that gives Kevyn Orr the authority to file this petition.
4. Under Chapter 9 only the duly elected representatives of the City of Detroit have power and authority to file such a petition. Kevyn Orr is an agent of the State of Michigan, whose relationship to the City of Detroit is that of an interested party.
5. To allow an agent of the State of Michigan to take the City of Detroit into Chapter 9 bankruptcy without consent from the duly elected representatives of the City of Detroit, is tantamount to an involuntary bankruptcy, which is not allowed under Chapter 9.
6. There are several civil matters pending in the United States District Court which preceded the bankruptcy action which challenge whether the emergency manager laws in the State of Michigan, including Public Act 436 of 2012, are constitutional and this Court either does not, or may not, have jurisdiction over these matters.
7. The captioned bankruptcy proceedings should be stayed and this Honorable Court should formally request expedited consideration of all pending litigation raising legal and

constitutional challenges to the underlying authority of Governor Rick Snyder, Treasurer Andy Dillon, the State of Michigan, Emergency Manager Kevyn Orr and Restructuring Counsel Jones Day before proceeding with the bankruptcy case.

8. This Notice provides inadequate notice and opportunity to be heard by the date of August 19, 2013 when objections may be filed, as the Notice was received less than two (2) weeks before the date by which Objections must be filed.
9. Proceeding with the bankruptcy proceeding before the constitutionality of Public Act 436 is determined would exceed the lawful jurisdiction and purposes of bankruptcy under Chapter 9 and unjustly prejudice the rights of Detroit residents, including but not limited to the named plaintiffs in the pending litigation, creditors and interested parties.
10. The issues of authority and constitutionality of Public Act 436 should be resolved prior to the bankruptcy matter to avoid unlawful and unconstitutional extension of the jurisdiction and authority of the bankruptcy court under Article III of the United States Constitution.
11. For the foregoing reasons, this petition is not allowable under Chapter 9 and must be dismissed.

Respectfully submitted,

Deborah Lela Moore, LLC
name

Interested Party/Creditor

[4436] Lemay Road
Detroit, Michigan Republic

Address

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PROOF OF SERVICE

I hereby assert that on August 19, 2013, I filed the above Objections to the Petition Filed by One Kevyn D. Orr Seeking to Commence a Case Under Chapter 9 of Title 11 of the United States Bankruptcy Code on Behalf of the City of Detroit and served said Objections upon the following parties of record via United States Mail.

all rights reserved
Deborah Lela Moore, Esq.
Name

Counsel to the Debtor
David G. Heiman, Esq.
Heather Lennox, Esq.
Jones Day
North Point
901 Lakeside Avenue
Cleveland, OH 44114-1190
T: (216) 586-3939
F: (216) 579-0212
<http://www.jonesday.com>

Counsel to the Debtor
Jeffrey B. Ellman, Esq.
Jones Day
1420 Peachtree Street, NE
Suite 800
Atlanta, GA 30309-3053
T: (404) 521-3939
F: (404) 581-8330
<http://www.jonesday.com>

Counsel to the Debtor

Bruce Bennett, Esq.

Jones Day

555 South Flower Street

Fiftieth Floor

Los Angeles, CA 90071

T: (213) 489-3939

F: (213) 243-2539

<http://www.jonesday.com>

Local Counsel to the Debtor

Jonathan S. Green, Esq.

Stephen S. LaPlante, Esq.

Miller, Canfield, Paddock & Stone, P.L.C.

150 West Jefferson

Suite 2500

Detroit, MI 48226

T: (313) 963-6420

F: (313) 496-7500

<http://www.millercanfield.com>

Office of the United States Trustee

U.S. Department of Justice

211 West Fort Street

Suite 700

Detroit, MI 48226

T: (313) 226-7999

F: (313) 226-7952

<http://www.justice.gov/ust/r09>

DATED: August 19, 2013

2012 NOV -1 AM 11:22

Exhibit A

Bernard J. Youngblood
Wayne County Register of Deeds
November 01, 2012 11:21 AM
Inst: 2012425417 FXF Pages: 19
Liber: 50246 Page: 842



UCC FINANCING STATEMENT

FOLLOW INSTRUCTIONS (front and back) CAREFULLY

A. NAME & PHONE OF CONTACT AT FILER [optional]

B. SEND ACKNOWLEDGMENT TO: (Name and Address)

Deborah Moore, El
c/o: [4436] Lemay Road
non-domestic mail
Detroit, Michigan Republic
[zip code exempt]

THE ABOVE SPACE IS FOR FILING OFFICE USE ONLY

1. DEBTOR'S EXACT FULL LEGAL NAME - insert only one debtor name (1a or 1b) - do not abbreviate or combine names

1a. ORGANIZATION'S NAME AHMOSE MATH CENTER				FIRST NAME	MIDDLE NAME	SUFFIX
OR	1b. INDIVIDUAL'S LAST NAME			CITY	STATE	POSTAL CODE
1c. MAILING ADDRESS 320 MACK AVENUE				DETROIT	MI.	48201
1d. SEE INSTRUCTIONS				1e. TYPE OF ORGANIZATION Moorish Empire	1f. JURISDICTION OF ORGANIZATION Treaty: Peace & Friendship 244-	1g. ORGANIZATIONAL ID #, if any UN #208/1999, #AA222141
						<input type="checkbox"/> NONE

2. ADDITIONAL DEBTOR'S EXACT FULL LEGAL NAME - insert only one debtor name (2a or 2b) - do not abbreviate or combine names

2a. ORGANIZATION'S NAME				FIRST NAME	MIDDLE NAME	SUFFIX
OR	2b. INDIVIDUAL'S LAST NAME MOORE			DEBORAH	LELA	Leg. Fict.
2c. MAILING ADDRESS 4436 Lemay Street				Detroit	MI.	48214
2d. SEE INSTRUCTIONS				2e. TYPE OF ORGANIZATION LEGAL FICTION	2f. JURISDICTION OF ORGANIZATION equity, Mich. Compiled Law	2g. ORGANIZATIONAL ID #, if any 14th. amendment citizen
						<input type="checkbox"/> NONE

3. SECURED PARTY'S NAME (or NAME of TOTAL ASSIGNEE of ASSIGNOR S/P) - insert only one secured party name (3a or 3b)

3a. ORGANIZATION'S NAME				FIRST NAME	MIDDLE NAME	SUFFIX
OR	3b. INDIVIDUAL'S LAST NAME Moore			Deborah	Lela	El
3c. MAILING ADDRESS c/o: [4436] Lemay Road				Detroit	Mich.	[zip code exempt]
						U.S. Repl.

4. This FINANCING STATEMENT covers the following collateral:

NOTICE TO THE PUBLIC
SEE ATTACHMENTS

Exhibit A - Surety Bond # 0- - - - - 6421 (1)
Exhibit B - Bill of Exchange
Exhibit C - Power of Attorney
Exhibit D - Copyright Notice
Exhibit E - Declaration of Lawful Standing
Exhibit F - Security Agreement
Exhibit G - Deed 320 Mack

5. ALTERNATIVE DESIGNATION (if applicable):	LESSEE/LESSOR	CONSIGNEE/CONSIGNOR	BAILEE/BAI LOR	SELLER/BUYER	AG. LIEN	NON-UCC FILING
6. <input checked="" type="checkbox"/> This FINANCING STATEMENT is to be filed (for record) (or recorded) in the REAL ESTATE RECORDS. Attach Addendum (if applicable)	7. Check to REQUEST SEARCH REPORT(S) on Debtor(s) (optional)			All Debtors	Debtor 1	Debtor 2
8. OPTIONAL FILER REFERENCE DATA						

FILING OFFICE COPY - UCC FINANCING STATEMENT (FORM UCC1) (REV. 05/22/02)

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AFFIDAVIT of REHABILITATION and OCCUPATION

For the record, on the record, to let the record show that Deborah Lela Moore, El© is a natural woman, living being and over the age of 21 is competent to state the facts herein. She is not a corporation nor a legal fiction but is a flesh and blood sentient being. I do hereby claim interest on the following property at the corner of East Vernor Highway & Lillibridge resulting from the rehabilitation and occupation commenced on the said properties in 2010 and continuing throughout 2013. I do hereby state the following facts to be true and correct having first hand knowledge of the facts herein.

Deborah Lela Moore, El© and work crew performed rehabilitation on the properties of Lillibridge at 2261 and 2265. Rehab and maintenance included but was not limited to the following activities on said properties:

Install roof tarp
remove old tarp
Cut brushes-front
Removal of outside debris
Painted ceiling front room
Repair plywood front window
Board up windows 1st & 2nd fl.
Board up doors front, back, side
Security check int. & ext. perimeter
Install locks, front, side back doors
Paint front door
Call DWSD water main shutoff

stabilized front porch
landscape
cut tree stubs
measurements
prep for Public Works pickup
Wayne Co. Regis. Deeds research
Scrape paint front room
cut grass 2265 lot
banister install-front porch
bottom panel-front porch

SUPPLIES PURCHASED

roofing nails
wood nails
30 x 50 tarp
cleaning supplies
2 x 4 wood beams (2)
gasoline
hand saws (2)
white oil base paint
paint brush
brick caulking (2)
50lb. cement bags (2)
20 x 30 tarp

Total cost \$ 25,000

Total cost \$ 2,000

Signature-without prejudice

Deborah Lela Moore, El©

Print

Date: August 19, 2013

Co Mill

witness 1, signature

witness 2, signature

NOTARY PUBLIC

Subscribed and sworn to in county of _____

STATE OF MICHIGAN

before me this _____ day of _____ A.D., 2013

}

ss jurat

My commission expires _____

COUNTY OF WAYNE

Witness my hand and official seal.

Signature of Notary or DeJure